

2.

On February 28, 2014, the parties participated in a mediation session with Mr. Hunter R. Hughes, III, an attorney knowledgeable with the FLSA, serving as mediator.

3.

Based upon the understandings and assessments of each party, the Parties, acting at arms-length and in good faith, negotiated and entered into a confidential Settlement Agreement and Release of Claims (hereafter “the Agreement”).

4.

Because the Parties have agreed to keep the terms of the Agreement confidential, the Parties will submit a copy of the Agreement directly to chambers for the Court’s consideration, along with a courtesy copy of this Motion.

5.

The Parties represent that the terms set forth in the Agreement represent a reasonable compromise between the positions of the Parties.

6.

Pursuant to Lynn’s Food Stores, Inc. v. United States of Am., 679 F.2d 1350, 1353 (11th Cir. 1982), judicial approval is required to give effect to Plaintiffs’ release of their FLSA claims, which is material to the Agreement.

7.

Once the Court approves the Agreement and all payments have made as set forth in Paragraph 1 of the Settlement Agreement, the Parties will file a Stipulation of Dismissal of this case with prejudice.

8.

The Parties further request that the Court retain jurisdiction over this matter until all payments have been made as set forth in Paragraph 1 of the Settlement Agreement and incorporate the Settlement Agreement into its Order granting this Motion.

WHEREFORE, the Parties respectfully request that this Court review and approve their Settlement Agreement and Full and Final Release of All Claims. For the Court's convenience, a proposed Order granting this Motion is attached hereto as Attachment "A".

Respectfully submitted,

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